

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ESTATE OF JORDAN BAKER, by and	)	
through administrator, JANET BAKER,	)	No. 4:15-cv-3495
	)	
Plaintiff,	)	
	)	
v.	)	Judge Sim Lake
	)	
JUVENTINO CASTRO, THE CITY OF	)	
HOUSTON, RPI MANAGEMENT	)	
COMPANY, LLC, and RPI INTERESTS	)	
I, LTD,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

**PLAINTIFF'S SIXTH SET OF**  
**REQUESTS FOR PRODUCTION TO THE CITY OF HOUSTON**

Plaintiff JANET BAKER, by her undersigned attorneys, propounds the following Requests for Production under Rule 34 of the Federal Rules of Civil Procedure on Defendant City of Houston, to be completed within thirty days after service hereof.

**DEFINITIONS & INSTRUCTIONS**

Plaintiff hereby expressly incorporates the definitions and instructions contained in Plaintiff's First Set of Interrogatories to the City of Houston, as well as any definitions and instructions contained in any of prior discovery requests, if any.

**REQUESTS FOR PRODUCTION**

1. All Documents, reports, or data provided by the City of Houston or the Department to Anthony L. Colucci, JohnPatrick McCleary, Yan Jie Ng or any other authors, collaborators, or individuals affiliated with Northwestern University (including William Haarlow) in relation to the thesis *Mathematical Methods in Social Sciences Houston Texas Police Department Project on Officer-Involved Shooting*, Northwestern University, June 4, 2014, attached hereto as Exhibit 1. To the extent any such document, reports, or data have already been provided in this litigation, please identify them by bates number.

**Exhibit G**

2. Any documents, memoranda, reports, or other communications in the possession of the City of Houston or the Department regarding or referring to Exhibit 1. This Request includes but is not limited to any documents provided to the City or the Department by the authors of Exhibit 1, including any presentations, as well as any documents provided to them.

3. Any communications between the City of Houston or the Department and Anthony L. Colucci, JohnPatrick McCleary, Yan Jie Ng or any other authors, collaborators, or individuals affiliated with Northwestern University (including William Haarlow) in relation to Exhibit 1. This request specifically includes, but is not limited to any letters, reports, emails, text messages, or other Communications made by Chief Charles McClelland, Executive Assistant Chief Timothy Oettmeier, Sergeant Daryl Brown, Sergeant Jack Phillips, Sergeant Ron Pinkerton, Police Officer T. Bratton, Captian M.W. Martin, Captian D.W. Ready, Lieutenant J. SZitzmann, Seargent R. Rodriguez, and Officer M. Burrow to Anthony L. Colucci, JohnPatrick McCleary, Yan Jie Ng, Professor William Haarlow, or any other authors of Exhibit 1. To the extent any such document, reports, or data have already been provided in this litigation, please identify them by bates number.

4. All Documents, reports, or data provided by the City of Houston or the Department provided to Roland G. Fryer, Jr. or other authors, collaborators, or individuals affiliated with the National Bureau of Economic Research, of *An Empirical Analysis of Racial Differences in Police Use of Force*, National Bureau of Economic Research, July 2016, attached hereto as Exhibit 2.

5. Any documents, memoranda, reports, or other communications in the possession of the City of Houston or the Department regarding or referring to Exhibit 1. This Request includes but is not limited to any documents provided to the City or the Department by the author of Exhibit 2.

6. Any communications between the City of Houston or the Department and Roland G. Fryer, Jr. in relation to Exhibit 2. This request specifically includes, but is not limited to any letters, reports, emails, text messages, or other Communications made by Chief Charles McClelland to Professor Fryer or any other individual affiliated with Exhibit 1. To the extent any such document, reports, or data have already been provided in this litigation, please identify them by bates number.

RESPECTFULLY SUBMITTED,

**JANET BAKER**

BY: /s/ David B. Owens  
One of Plaintiff's Attorneys

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**CERTIFICATE OF SERVICE**

I, David B. Owenns, an attorney, hereby certify that on July 18, 2017, I served the foregoing Plaintiff's Sixth Set of Requests for Production to the City of Houston on all counsel of record listed below via electronic mail and U.S. mail.

/s/ David B. Owens

*One of Plaintiff's Attorneys*